

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
HARRISBURG DIVISION

JOHN RICHARD JAE,

CIT No. 1-CK-00-106

Plaintiff,

U.S. District Judge  
Magistrate Judge Smyce

vs.

DR. ROBERT CLARK et al.,

Defendants.

FILED  
HARRISBURG

NOV 16 2000

MARY E. D'ANDREA, CLERK  
Per. [Signature]  
DEPUTY CLERK

MOTION FOR ENLARGEMENT OF TIME

COMES NOW, the Plaintiff, John Richard Jae, as a Layman Unlettered in the Arts & Sciences of the laws & legal procedures within the United States who now files his Motion for Enlargement of Time, pursuant to Fed. R. Civ. P. 6(b) & who, avers, deposes & states:

1. On or About October 10, 2000, Defendant Dr. Clark filed his Motion to Dismiss Plaintiff's Complaint, herein this case, & his Brief Appending Exhibits in support was filed on October 24, 2000, herein.

2. Due to the facts that Plaintiff does not have enough Paper to make three copies of his 10 Page Reply Brief In Opposition To Defendant's Motion To Dismiss Plaintiff's Complaint as Prison officials illegally limit the amount of free paper that Plaintiff as an indigent inmate can receive per month, Plaintiff is unable to file his Reply Brief in Opposition To Defendant's Motion To Dismiss Plaintiff's Complaint by the present due date of such of

November 13, 2000, Plaintiff requests an enlargement of time  
thirty five days from this date, to & including December 15,  
in which to file & serve his Reply Brief in Opposition to  
Defendant Clark's Motion to Plaintiff's Complaint, herein this case.

3. This Motion is not meant to prejudice  
the Defendant nor unduly delay the proceedings in  
this case nor is it believed that such prejudice  
or undue delay will occur.

(w) HEREOF, this Court should grant this Motion  
in full, herein this case:

RESPECTFULLY SUBMITTED:

(s) John Richard Jae  
MR. JOHN RICHARD JAE,  
Plaintiff and Pro Se Counsel

Dated: 10th NOVEMBER 2000:

MR. John Richard Jae,  
#BQ-3219  
Sgt-Greene/SMU  
175 Progress Drive  
Waynesburg, PA 15370

a

Joe vs. Clark et al.  
 CIVIL No. 1: CV-00-1090  
CERTIFICATE OF SERVICE

I Certify that on 11/10/00, I mailed to the persons listed below, a true & correct copy each of the with Plaintiff's Motion For Enlargement of Time, by way of U.S. First Class Mail, Postage Prepaid:

I Certify that on 11/10/00, I gave to a Prison Officer here for mailing to this court the original of the above-same document:

I Certify under penalty of perjury & pursuant to 28 § 1746 that the above is true & correct:

MR. James D. Yang, Esquire  
 LAVERY, FAHERTY, YANG & PATTERSON, P.C.  
 Attorneys At Law  
 P. O. Box 1245  
 Harrisburg, PA. 17108-1245

MR. Robert M. Wolf  
 Assistant Counsel  
 Pennsylvania Department of Corrections  
 55 Utley Drive  
 Camp Hill, PA. 17011

Dated/Executed on:

10th NOVEMBER 2000:

(S) John Richard  
 MR. JOHN RICHARD  
 Plaintiff and Pro Se Counsel

At Waynesburg, Pennsylvania:

From The Desk of:  
MR. JOHN RICHARD JAE  
#BR-3819  
SCT-Greene/SMU  
175 Progress Drive  
Waynesburg, PA. 15370  
November 19, 2000

To: The Office of The Clerk,  
USDC - Middle District  
228 Walnut Street  
P.O. Box 983  
Harrisburg, PA. 17108-0983

Re: Jae vs. Clark, et al.,  
Civil No. 1:00-CV-00-1090

Dear Clerk:

Please file the Enclosed Motion For Extension  
of Time, herein the above-entitled Civil Rights Action.

Sincerely,  
(s) John Richard Jae  
MR. JOHN RICHARD JAE  
Plaintiff and Pro Se Counsel

CC: MR. James D. Young, Esq.,  
MR. Robert M. Wolff, Esq.,  
w/encl.